

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA

vs.

JACOEVIS D. WARDEN
JAYHOVA C. FREEMAN
KIONNA A. JETER
LYRICS R. KLUGH

CR. No.

10:24-378

18 U.S.C. § 371

18 U.S.C. § 1708

18 U.S.C. § 1704

18 U.S.C. § 2

SEALED
INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

1. That beginning at a date unknown to the Grand Jury but from at least in or about September 2023 and continuing thereafter up and to the date of this Indictment, the exact dates being unknown to the Grand Jury, in the District of South Carolina and elsewhere, the Defendants, JACOEVIS D. WARDEN, JAYHOVA C. FREEMAN, KIONNA A. JETER, and LYRICS R. KLUGH, knowingly and willfully did combine, conspire, confederate, agree and have a tacit understanding with each other and with others known and unknown to the Grand Jury, to knowingly steal mail and possess stolen mail, in violation of Title 18, United States Code, Section 1708.

Manner and Means

2. It was part of the conspiracy that the Defendants would steal and take letters that had been placed in authorized depositories for mail matter (mail boxes).

3. It was further part of the conspiracy that to facilitate the theft of mail Defendants obtained arrow keys from the Postal Service.

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4. It was further part of the conspiracy that Defendants sorted stolen mail and sought business checks that could be counterfeited and/or altered.

5. It was further part of the conspiracy that Defendants would divide among themselves the proceeds from their criminal activity.

Overt Acts

6. In furtherance of the conspiracy and to effect the objects thereof, the following overt acts, among others, were committed in the District of South Carolina and elsewhere:

a. On or about September 7, 2023, JACOEVIS D. WARDEN possessed an arrow key belonging to the Postal Service.

b. On or about January 14, 2024, JAYHOVA C. FREEMAN possessed an arrow key belonging to the Postal Service.

c. On or about January 30, 2024, KIONNA A. JETER sold an arrow key to JAYHOVA C. FREEMAN.

d. On or about February 8, 2024, LYRICS R. KLUGH stole an arrow key from the Pleasantburg Station Post Office.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

On or about September 7, 2023, in the District of South Carolina, the Defendant, JACOEVIS D. WARDEN, did unlawfully have in his possession multiple letters belonging to other persons which had been stolen, taken, embezzled and abstracted from an authorized depository for mail matter, knowing the said letters to have been stolen, taken, embezzled and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Section 1708.

COUNT 3

THE GRAND JURY FURTHER CHARGES:

On or about January 14, 2024, in the District of South Carolina, the Defendant, JAYHOVA C. FREEMAN, did unlawfully have in his possession multiple letters belonging to other persons which had been stolen, taken, embezzled and abstracted from an authorized depository for mail matter, knowing the said letters to have been stolen, taken, embezzled and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Section 1708.

COUNT 4

THE GRAND JURY FURTHER CHARGES:

On or about January 30, 2024, in the District of South Carolina, the Defendants, KIONNA A. JETER and LYRICS R. KLUGH, aiding and abetting each other and aided and abetted by each other, knowingly and unlawfully possessed a United States Postal Service arrow key used for authorized receptacles for the deposit of mail matter, with the intent to sell the same.

In violation of Title 18, United States Code, Sections 1704 and 2.

A True Bill

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FOREPERSON

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